

DECLARATION OF ROBERT MUSSIG

I, Robert Mussig, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron USA, Inc. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

7 2. I took the deposition of Plaintiff Mark Snookal on May 10, 2024, and I am in
8 possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit E** is a true
9 and correct copy of relevant excerpts from Plaintiff's deposition transcript. During his deposition,
10 Plaintiff authenticated a number of documents – including documents that were marked as
11 Exhibits 1, 3-8, 10, 12-13, and 17-19 at the deposition – that are each referenced in the
12 concurrently filed Joint Brief re Motion for Summary Judgment and Statement of Uncontroverted
13 Facts and Genuine Disputes. Those documents are attached hereto as **Exhibits E-1, E-3, E-4, E-5,**
14 **E-6, E-7, E-8, E-10, E-12, E-13, E-17, E-18, and E-19:**

Exhibit E-1: Assignment Offer

Exhibit E-3: Medical Suitability for Expatriate Assignment History & Physical Examination

Exhibit E-4: July 29, 2019 doctor's note

Exhibit E-5: Expatriate Exam Recommendations

Exhibit E-6: August 29, 2019 email from

Exhibit E-7: September 16, 2019 email from S. Levy re medical

Exhibit E-8: September 6, 2019 email from A. Powers re Rescind

Nigeria

Figure 12. L1 Derivatives for E1S and 1-Cyclohexyl-1-phenyl-

TABLE 12.1. Description of EIS and Pesticide Mixture

Lead

Exhibit E-17: Plaintiff's resignation letter

Exhibit E-18: Plaintiff's termination paperwork

Exhibit E-19: Plaintiff's Exit Interview

3 3. I defended the deposition of Dr. Eshiofe Asekomeh on October 10, 2024, and I am
4 in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit F** is a
5 true and correct copy of relevant excerpts from Dr. Asekomeh's deposition transcript.

6 4. I defended the deposition of Dr. Scott Levy on August 30, 2024, and I am in
7 possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit G** is a true
8 and correct copy of relevant excerpts from Dr. Levy's deposition transcript.

9 5. My office defended the deposition of Andrew Powers on September 17, 2024, and I
10 am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit H** is a
11 true and correct copy of relevant excerpts from Mr. Powers's deposition transcript.

12 6. My office took the deposition of Dr. Shahid Hameed Khan on February 10, 2025,
13 and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit**
14 **I** is a true and correct copy of relevant excerpts from Dr. Khan's deposition transcript.

15 7. My office defended the deposition of Dr. Ujomoti Akintunde on October 31, 2024,
16 and I am in possession of a certified copy of her deposition transcript. Attached hereto as **Exhibit**
17 **J** is a true and correct copy of relevant excerpts from Dr. Akintunde's deposition transcript.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct, and that this Declaration was executed on March 6, 2025, at Los
21 Angeles, California.


ROBERT MUSSIG